

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

WILLIAM LAWSON, JOE TRIPODI, THOMAS)
WHITTINGTON, JASON PHILLIPS, AND)
NESBIT B. ("BRAD") SILLS, Individually and On)
Behalf of All Others Similarly Situated,)

Plaintiffs,

v.

BELLSOUTH TELECOMMUNICATIONS, INC.,)
d/b/a AT&T SOUTHEAST a.k.a. AT&T)
ALABAMA/AT&T FLORIDA/AT&T GEORGIA/)
AT&T KENTUCKY/AT&T LOUISIANA/AT&T)
MISSISSIPPI/AT&T NORTH CAROLINA, AT&T)
SOUTH CAROLINA/AT&T TENNESSEE,)

Defendant.

Civil Action File No.
1:09-cv-3528-JEC

JURY TRIAL
DEMANDED

JOINT MOTION TO STAY PROCEEDINGS

Plaintiffs William Lawson, Joe Tripodi, Thomas Whittington, Jason Phillips, Nesbit B. Sills, and the opt-in Plaintiffs ("Plaintiffs") and Defendant BellSouth Telecommunications, Inc. ("Defendant" or "BellSouth") hereby jointly move for a stay of all proceedings in the case until August 10, 2012. As set forth in the attached Memorandum, the parties have reached a settlement in this case and are preparing to submit to the Court their request for approval of that settlement.

WHEREFORE, Plaintiffs and Defendant respectfully request that the Court stay all proceedings in the case until August 10, 2012.

Respectfully and jointly submitted,

By: /s/ Steven L. Wittels

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Attorneys for Defendant

Date: June 11, 2012

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**MEMORANDUM IN SUPPORT OF JOINT MOTION
TO STAY PROCEEDINGS**

The Court granted conditional certification of Plaintiffs' Fair Labor Standards Act ("FLSA") claims on August 16, 2011. See Order on Motion to Certify Class [Doc. 98]. Notice was issued to the conditionally certified class on December 15, 2011 and the notice period closed on February 13, 2012. The parties have subsequently mediated all claims and have reached a settlement of this collective action. The parties have also reached a settlement of the claims in *Luque et al v. AT&T Corp. et al*, 3:09-CV-05885-CRB (N.D. Cal.). Because of the number of employees covered by the settlement, the parties anticipate that

finalizing the settlement papers and performing the corresponding data analysis in connection with the settlement will be an involved process that will require significant time to complete.

Accordingly, the parties respectfully request that the Court stay any and all proceedings in this matter until August 10, 2012 to allow the parties sufficient time to prepare an application for approval of the settlement that will be filed on or before that date.

WHEREFORE, Plaintiffs and Defendant respectfully request that the Court stay all proceedings until August 10, 2012.

Respectfully and jointly submitted,

By: /s/ Steven L. Wittels

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Date: June 11, 2012

By their signatures above, counsel for the parties represent that, pursuant to Local Rules 5.1B and 7.1D, this motion and memorandum were prepared in the font of Times New Roman, 14 point.